

# EXHIBIT 32

**Archived:** Tuesday, July 22, 2025 6:49:19 PM

**From:** [Rodgers, James](#)

**Sent:** Tue, 22 Jul 2025 02:17:55

**To:** [James Chapman](#) [Mark Nanavati](#)

**Cc:** [Rodgers, James](#) [Mackenzie Pensyl](#) [W. Ryan Snow](#) [Zach Jett](#) [Murphy, Siobhan](#) [Johnson, Dawn](#) [Werner, Rachel](#) [Roman, Michael](#)

**Subject:** In re Coeyman Marine Towing, et al, USDC, EDVA; Meet and Confer of July 21, 2025 [CC-US.980000.981028.FID1207794]

**Importance:** Normal

**Sensitivity:** None

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Jim and Mark,

At today's Meet and Confer we discussed, *inter alia*, Belt Line's notice for deposition of Josef Malik, Esq. Rather than produce Mr. Malik next week as we had anticipated, we prefer to await the Court's guidance vis-à-vis Carver's Motion for Protective Order, which we intend to file shortly. As we discussed, there is a disagreement between the parties as to the scope of Mr. Malik's deposition. We are contacting you tonight to avoid any undue reliance on our earlier representation of today's date.

We also understand that you will get back to us tomorrow on whether Belt Line will continue to pursue the deposition of Jason Galioto following your receipt of Mr. Galioto's affidavit.

In addition, this confirms that at the Meet & Confer we asked Belt Line to withdraw its Motion to Dismiss the Limitation based on Carver's 30(b)(6) witness, as well as objections of mine at several depositions. We confirm herein that you declined to withdraw same.

Likewise, we requested today that Belt Line withdraw its Motion to Compel the inspection of the tug. We confirm herein that you declined to withdraw same.

Finally, as to Mr. Malik's deposition as set forth above, we requested today that you withdraw your positions as stated in your letter of July 17, 2025. We confirm herein that you declined to withdraw same.

We continue to work at scheduling Mr. Warlordy and Mr. O'Rourke for depositions as well as an inspection of the tug. This also confirms that we have agreed on a new date of August 13<sup>th</sup> for the Zoom depositions of Captain Lewis and Mr. Furborough.

Please call me directly at 212-702-6771 if you have any questions or need clarification.

Yours, etc,  
Jim

**James Rodgers**

Senior Counsel | Clyde & Co US LLP

**Direct Dial:** [+1 212 702 6771](tel:+12127026771) | **Mobile:** [+1 646 853 4277](tel:+16468534277)

**CLYDE&CO**

The Chrysler Building | 405 Lexington Avenue | 16th Floor | New York | NY 10174 | USA  
Main [+1 212 710 3900](tel:+12127103900) | Fax [+1 212 710 3950](tel:+12127103950) | [www.clydeco.us](http://www.clydeco.us)



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